



CITY OF SAN ANTONIO

ETHICS CODE

HANDBOOK FOR
CITY OFFICIALS

JULY 2009



TABLE OF CONTENTS

Rules for Current Officials and Employees

Who are City Officials and City Officers?	1
Conflicts of Interest	2 - 3
Unfair Advancement of Private Interests	4 - 5
Gifts	6 - 7
Prohibited Contracts	8 - 9
Misuse of Public Resources	10
Political Activity	10
Representation of Private Interests before the City	11
Confidential Information	12
Conflicting Outside Employment	12
Actions of Others and Duty to Report Violations	13

Rules for Contractors

“Cone of Silence”	13
Prohibited Campaign Contributions	13

Rules for Former Officials and Employees

Continuing Confidentiality	14
Prohibited Contracts	14
Subsequent Representation of Private Interests	14 - 15
Prior Participation in the Negotiation, Award or Administration of Contracts	15

Reporting Requirements

16 - 17

Advisory Opinions & Ethics Complaints

18 - 19

Degrees of Family Relationship

20

Contacts and Resources Information

21



INTRODUCTION

The City of San Antonio has adopted a Code of Ethics which established standards of conduct for current and former City officials and employees, lobbyists and individuals doing business with the city. This handbook was designed to provide an overview of the provisions of the code which most directly affect the city's elected and appointed officials. Use this handbook as a guide and introduction, but please note that it is not intended to take the place of reading the code itself. A similar handbook is available for city employees.

A complete hard-copy edition of the Ethics Code as well as other handbooks can be provided by the Office of the City Attorney upon request. In addition, the Ethics Code, handbooks, disclosure forms and other information regarding the city's ethics regulations have been posted on the Ethics Webpage at: **www.sanantonio.gov/ecfl**.

You are welcome to contact the ethics attorneys at the Office of the City Attorney at (210) 207-8940 concerning any questions you may have regarding the city's Ethics Code. Contact and resources information is included on page 21.





WHO ARE CITY OFFICIALS?

The city's Ethics Code imposes certain standards of conduct upon the city's officials and employees. Under the code, "city officials" include:

- The Mayor and Members of City Council: Assistant to Mayor and Assistant to the City Council;
- The City Manager, Deputy City Managers, Assistant City Managers and Assistants to the City Manager;
- All department heads and assistant department heads;
- Municipal Court Judges and Magistrates;
- Members of all boards, commissions, committees and other bodies created by City Council pursuant to federal or state law or city ordinance, including entities that may be advisory only in nature, who are appointed by City Council or who are designated in the by-laws or organization papers of the entity to serve on behalf of the city; and
- Board members of any entity who are appointed by the City Council.

WHO ARE CITY OFFICERS?

Section 141 of the City Charter imposes an additional provision on "city officers," prohibiting these individuals, their immediate family members and any businesses they own from entering into business relationships with the city. "City officers" are defined to be:

- The Mayor and Members of City Council;
- Municipal Court Judges and Magistrates;
- Members of any board or commission that is more than advisory in nature.

Section 141 of the City Charter and its application are discussed on pages 8 - 9 of this handbook.



CONFLICTS OF INTEREST

City officials and employees cannot take part in any matter as a representative of the city where action by the city might affect the financial interests of themselves, their family members or household members. A city official has a conflict of interest if city action will affect the economic or financial interests of:

- 1) the official;
- 2) the official's family members or members up to the second degree of the official's household;
- 3) the employers of the official's family or household members;
- 4) businesses owned by the official or by family or household members;
- 5) the official's outside employers or clients;
- 6) any business or non-profit organization for which the official serves as an officer, director or in any policy-making position;
- 7) any person or business with whom the official is negotiating or considering an offer of employment or a business opportunity.

A family relationship chart explaining the degrees of relatives is included on page 20.

If you have a conflict:

- Promptly disclose the conflict to the other members of the board or commission;
- File a recusal form at the Office of the City Clerk to disclose the conflict and describe the matter from which you are removing yourself. Forms are located on the Ethics Website or at the Office of the City Clerk. The board or commission liaison can also assist.
- The official shall refrain from any participation in the matter in which there is a conflict. Recusal requires that the official not be present during the board's discussion or voting on the matter.



CONFLICTS OF INTEREST

Examples:

1. Bill serves on the City Council which is in the process of reviewing proposals and making recommendations for the city's purchase of new gardening equipment. When Bill begins to look over the proposals, he noticed that the company for which his brother works is one of the businesses seeking this contract. Bill has a conflict of interest which requires him to recuse himself from this matter. He must file a recusal form with the Office of the City Clerk and excuse himself from the meeting while the council discusses and votes on this recommendation.

2. Susan is a member of the city's Parks and Recreation Board. The board has been asked to review an application from a youth non-profit sports organization that would like to obtain funding for its summer program. Susan was just recently appointed to serve on the board of this outside sports organization, although this application was submitted before that appointment. Although she was not involved in the submission of the application and even though the city's action on this matter will not affect Susan financially, Susan has a conflict because of her membership in the board of this outside organization and she must recuse herself.

3. Ray has served on the Development Services Board for several years. Greg, the owner of Acme Construction, has come before the board on several occasions. Greg was impressed by Ray's knowledge and his work on the board and asked Ray whether he would like to work for his company. Ray was interested and said he would like to talk about this opportunity some more. Because he is considering employment with Acme Construction, Ray has a conflict of interest in handling any matter involving Greg or Acme. Ray must advise the other board members of the conflict and submit a recusal form to the Office of the City Clerk.

Note: If Ray accepts employment with Acme, he must be aware that the city's Ethics Code will limit his ability to assist Acme or its clients in their appearances before the Development Services Board for two years after leaving the service of that board. Please see the section regarding the Ethics Code provisions for former officials and employees on pages 14 -15.



UNFAIR ADVANCEMENT OF PRIVATE INTERESTS

The Ethics Code prohibits city officials and employees from using their position with the city to obtain special treatment for themselves or anyone else. This includes using a city position to unfairly hurt another's private interests. In short, decisions on behalf of the city must be on the merits on the issue and not on personal considerations.

This provision includes some specific rules:

- 1) If you know the city will be taking official action on a contract, a zoning decision, or other matters, do not use that knowledge to profit from the transaction;
- 2) Do not agree with anyone to receive something in return for official action you take;
- 3) Do not participate in the hiring, appointment or a vote for your spouse or any relative within the 3rd degree for an office or job with the city;
- 4) You cannot supervise your spouse or relative within the 3rd degree of consanguinity or second degree of affinity.

If you have a conflict under this provision:

- Promptly disclose the conflict to the other members of the board or commission;
- File a recusal form at the Office of the City Clerk to disclose the conflict and to describe the matter from which you are removing yourself. Forms are located on the Ethics Website or at the Office of the City Clerk. The board or commission liaison can also assist.
- The official shall refrain from any participation in the matter in which there is a conflict. Recusal requires that the official not be present during the board's discussion or voting on the matter.



UNFAIR ADVANCEMENT OF PRIVATE INTERESTS

Examples:

1. Tom is a member of the Commission of Housing Services. Tom owns property close to an area that is under consideration for change in zoning from residential to commercial. If the area is re-zoned as commercial, the values of these properties may rise. Tom cannot be involved in any discussion or action pertaining to this proposed zoning change.

Sarah also serves on this same board. Sarah must not purchase property that may be affected by the zoning change while the issue is still pending before the city.

2. Kathy serves on the Public Health Commission. On the weekends, she likes to volunteer at a senior citizen center teaching arts and crafts. The senior center has contacted the Public Health Commission to seek funding for some medical supplies and personnel for an upcoming health fair. In her capacity as a Public Health Commissioner, Kathy would not have “conflict of interest” as described in the prior section because the city’s action will not affect the financial interests of Kathy, her family, the employers of her family members, or any organization on which she serves as an officer or in some decision-making capacity.

Kathy, though, should consider whether she can make a fair decision based on the merits of the application given her involvement with the center. If she cannot make a fair decision, she must recuse herself under this prohibition against unfair advancement of private interests.





GIFTS

There are two rules regarding the receipt of gifts by city officials and employees under the Ethics Code.

Gift Rule 1. A city official or employee cannot ask for or accept a gift which is given for the purpose of influencing that person to take a certain action in their role as a city official or employee.

Gift Rule 2. A city official or employee cannot ask for or accept gifts from:

- A. A person or entity which is doing or seeking to do business with the city;
- B. A registered lobbyist;
- C. A person or entity which is seeking action on a zoning or platting matter before the city.

There are exceptions to Gift Rule 2:

- 1. Items of nominal value (\$50 or less);
- 2. A meal up to \$50 (\$500 limit during a calendar year for meals paid for by a single source);
- 3. A reasonable gift for a special occasion in keeping with the employee's non-city relationship with the giver;
- 4. Admission to an event to which the official's spouse has been invited because of the spouse's position;
- 5. Gifts received for civic or charitable causes;
- 6. Reasonable awards for meritorious service;
- 7. Reimbursement or payment of travel costs related to business purpose.
(Requires Travel Report to be filed with Office of the City Clerk).

Gift Reporting. An official who accepts a gift or expenditure under these exceptions or whose family members accept such gifts may be required to disclose the gift in his or her Annual Financial Disclosure report and in a Conflict Disclosure Statement (Form CIS). See Reporting Requirements section of this handbook on page 17 or contact the Office of the City Attorney at (210) 207-8940 for information.



GIFTS

Examples:

1. Lucinda serves on the Library Board, which occasionally makes recommendations to the department on large contract purchases. Roland from Big Company Book Supplies would like to meet with Lucinda to discuss the merits of their products. Lucinda knew Roland back in high school, but not well. Roland has asked Lucinda if he could take her to lunch to discuss Big Company's catalog of products. He also offered Lucinda a nice desk clock with the Big Company logo on its face. Lucinda may accept the meal and the clock so long as each item is worth \$50 or less.

During the lunch, Roland told Lucinda that he would give her a laptop computer for her own use to "test drive" the Big Company product if she agreed to recommend Big Company products to the city. Under Gift Rule 1, Lucinda cannot accept this gift, regardless of the value, because Roland is offering it to her in exchange for her agreement to recommend the purchase of products from Big Company.

2. Ned serves on the same board. Roland from Big Company has been Ned's close friend since high school. They have traditionally exchanged Christmas gifts and attended the special occasions of one another's family. Even though Roland is a person seeking business with the city, he and Ned may continue to exchange the same types of gifts they have traditionally given to one another on special occasions.

However, Roland has now approached Ned and offered to take him to lunch to discuss the Big Company's products and to provide him with a laptop in exchange for helping Big Company do business with the Library. Like Lucinda, Ned cannot accept the laptop under Gift Rule 1 because it is being offered in exchange for his agreement to help Big Company get business. Ned should also be careful about being involved in any matter involving Roland or Big Company under the rule prohibiting the Unfair Advancement of Private Interests since his personal relationship with Roland may make it difficult for Ned to make such decisions on the merits.



PROHIBITED CONTRACTS

Section 141 of the City Charter and the Ethics Code impose an additional standard of conduct which prohibits a city officer or his or her family or their businesses from having a business relationship with the City. A city officer is defined slightly differently than city official. “City officers” are defined to be:

- The Mayor and Members of City Council;
- Municipal Court Judges and Magistrates;
- Members of any board or commission that is more than advisory in nature

This rule also applies to executive-level employees who are required to file annual financial disclosure statements under Section 2-73 of the Ethics Code. It does not apply to other employees.

The penalty for a willful violation is forfeiture of the officer’s position with the city. Also, any contract between the officer, the officer’s family or their businesses also becomes voidable by the City Council or City Manager. This is not a conflict-of-interest rule. Recusal or non-participation in the matter does not cure the violation.

This rule states that a city officer or high-ranking staff member cannot have a “prohibited financial interest” in a contract with the city. A prohibited financial interest includes:

- A contract with the city in which the officer, a parent, child, sibling or spouse, or any other first-degree relative is a party;
- A contract in which the officer, parent, child, sibling or spouse, or any other first-degree relative owns 10% or more of a business which is a party;
- A contract in which any of these individuals or businesses is a subcontractor, a partner or a parent or subsidiary business on a city contract.

An application can be made to the Ethics Review Board for a determination that a prohibited interest does not exist. Also, any contract already in place at the time a person becomes subject to this provision may remain in effect until its expiration. Please contact the Office of the City Attorney for information or an advisory opinion on this rule.



PROHIBITED CONTRACTS

Examples:

1. Ellen is a member of the City Council. Ellen's mother, Nancy, has a catering business and would like to seek a contract with the city to provide dinners for evening board meetings. Nancy's contract with the city would create a "prohibited financial interest" for Ellen. The caterer will be selected by the Purchasing Department and the contract will not require council action. Nevertheless, it does not matter that Ellen has no involvement in the selection or use of the catering service.

2. Linda serves on the Plumbing and Electric Board, a board that is more than advisory in nature. Her brother, Bill, owns a small print shop and is interested in becoming a subcontractor on a brochure printing contract that a larger company has been awarded by the city's Cultural Affairs Department. Linda, as a member of the Plumbing and Electric Board, has no role or involvement in the brochure contract. Nevertheless, under the "Prohibited Contracts" provision, her brother's interest in the subcontract would create a "prohibited interest" for Linda. The sanction for a willful violation of this provision is forfeiture of the position with the city and the contract at issue can be voided by the City Council or City Manager. If Linda, however, has no financial relationship with her brother or his business, she may apply to the Ethics Review Board for a determination that she has no actual financial interest. If such a determination is made, Bill may seek the subcontract without creating a prohibited interest for his sister.



MISUSE OF PUBLIC PROPERTY

City officials and employees cannot use or permit the use of city facilities, personnel, equipment, supplies or time while on city duty for private purposes, including political activity. City officials and employees, though, may use city facilities on the same terms and conditions as any member of the public.

Examples:

Tina, a member of the Animal Care Services Board, would like to use the city animal pick-up truck to move some furniture to her house on the weekend. Even though she plans to fill the tank with gas with her own money, Tina cannot use the city truck for this personal purpose.

Tina also needs a notary for her paperwork related to the purchase of her new home. She cannot use the notary service of a city staff member whose notary certification is paid for by the city for the execution of city business.

POLITICAL ACTIVITY

In general, boards and commissions members and council contract aides are not prohibited from engaging in political activity, so long as it is not done on city property or using any city resource. The Ethics Code also prohibits a city official or employee from inducing any subordinate to participate in or to refrain from any lawful political activity.

City personnel cannot accept any thing of value for political activity relating to an item pending on the ballot if he or she participated in the development of the ballot item. City personnel are also prohibited from displaying any campaign materials on any city vehicle.

Political activity by city employees is limited by the City Charter and City Personnel Rules, especially in connection with elections for San Antonio City Council. See the City Charter and Administrative Directive 1.2 for further information.



REPRESENTATION OF PRIVATE INTERESTS BEFORE THE CITY – BY BOARD MEMBERS

A city official cannot represent a person, group or entity:

- before that board or body on which he or she serves;
- before city staff having responsibility for making recommendations to, or taking any action on behalf of, that board or body, unless the board is advisory in nature; or
- before a board or other city body that has appellate jurisdiction over the board on which the city official is a member, if any issue relates to the official's duties on the board.

In addition, city officials cannot represent any person or entity other than himself or herself and family members in litigation against the city where the interests of that person or group is adverse to the city.

Example:

Donna, a member of the Planning Commission, and members of her neighborhood association are concerned about the city's plans to widen the road in front of her children's school. Donna may not appear before the Planning Commission meeting on behalf of the neighborhood association regarding the street plans.

REPRESENTATION OF PRIVATE INTERESTS BEFORE THE CITY – BY EMPLOYEES

A city employee cannot represent a private interest before the city for compensation, nor may an employee assert that he or she is able to influence city action on any basis other than the merits. There are also restrictions on former employees regarding representation before the city. See pages 14 - 15 for more information.

In addition, city employees cannot represent any person or entity other than himself or herself and family members in litigation against the city where the interests of that person or group is adverse to the city.



CONFIDENTIAL INFORMATION

City officials and employees cannot reveal confidential information unless 1) the information is public; or 2) the employee is revealing illegal or unethical conduct to the proper authorities for legal attention. "Proper authorities" do not include members of the media.

Example:

Amy, a member of the Public Health Board, is reviewing files from the Public Health Department. Within the files, she sees that the husband of a friend of hers has been received medication for depression. Amy cannot discuss the information in the file or even the existence of the file with her friend.

CONFLICTING OUTSIDE EMPLOYMENT

An official or employee cannot accept outside employment that is related to the official's or employee's duties for the city or which would potentially impair the employee's judgment or faithful performance of his or her city duties.

Example:

Melvin has served on the Veterans' Affairs Board for three years. Due to his 25-year career with the military and many other experiences related to veterans' issues, he has been asked whether he might be interested in becoming a consultant for Vet Inc., a company that provides various services to retired military personnel. The consultant position would require, among other things, appearing on behalf of Vet Inc. and its clients before boards and commissions that handle veterans' issues, including the Veterans' Affairs Board. This employment would be in violation of the "Conflicting Outside Employment" provision because it is directly related to the work he performs for the city and because there is a substantial likelihood that his judgment or faithful performance of his city duties would be affected. Melvin would also be precluded from representing a private interest before the city, i.e. the clients of Vet Inc., under the "Representation of Private Interests before the City" provision, discussed on page 11.



ACTIONS OF OTHERS & DUTY TO REPORT

Officials and employees cannot intentionally or knowingly assist or induce any person to violate any provision in the Code of Ethics, nor can an official or employee violate the code through the acts of another.

The Ethics Code also requires that a city official or employee who has knowledge of a violation of the code must report the violation to the Office of the City Attorney or the Ethics Review Board.

RULES FOR CONTRACTORS

“CONE OF SILENCE”

Individuals or entities seeking contracts with the City and those acting on their behalf are prohibited from communicating with City officials or staff about the contract from the time the solicitation is released until the contract is posted as a City Council agenda item.

PROHIBITED CAMPAIGN CONTRIBUTIONS

Individuals seeking high-profile contracts, the owners or officers of entities seeking high-profile contracts, the legal signatories for high-profile contracts, any spouse of these individuals, or attorneys, lobbyists or other consultants retained to assist in seeking high-profile contracts cannot make campaign or officeholder contributions from 10th day after solicitation is released until 30 days after contract has been awarded. Zoning applicants and their spouses are also prohibited from making contributions from the date the application is submitted until 30 days after final action.





RESTRICTIONS ON FORMER OFFICIALS & EMPLOYEES

There are four provisions in the Ethics Code that apply to officials and employees who have left city service which are discussed here. A separate handbook has been prepared to discuss these rules in greater depth and to provide examples of their application. Please review the Handbook for Former Officials and Employees on the city's ethics webpage or contact the Office of the City Attorney for additional information or guidance.

1) **Continuing Confidentiality** (*Permanent Restriction*)
Former officials and employees cannot reveal or use confidential information learned or obtained through employment with the city.

2) **Prohibited Contracts - Former Members of Boards that are More than Advisory in Nature and Other Former City Officers** (*One-Year Restriction*)
Former elected officials, former executive staff and former members of boards or commissions which are more than advisory in nature, their immediate family members or businesses owned by either themselves or immediate family members are prohibited from seeking discretionary contracts with the city for one year after leaving city service. This provision does not apply to contracts for professional services.

Former officials who wish to enter into business relationships with the city less than one year after leaving city service should consult with the Office of the City Attorney for additional information or guidance.

3) **Subsequent Representation of Private Interests Before the City**

a) **Representation Before Former Board** (*Two-Year Restriction*)

A former city board member cannot represent a private interest:

- before the board or commission on which that person served;
- before city staff having responsibility for making recommendations to, or taking any action on behalf of, that board or body, unless the board or body is only advisory in nature; or
- before a board or other body which has appellate jurisdiction over the board on which the former official had served, if the issue in question related to official's former duties.



Note: A former city employee is prohibited from representing a private interest before the city for a period of two years after leaving city service. This prohibition applies to representation before any part of the city, not just the departments or boards with which the employee had previously worked.

b) Influence. (*Permanent Restriction*)

A former city official or employee cannot use or imply that he or she can affect city action for the benefit of another because of his or her former position with the city.

c) Litigation Against the City (*Permanent Restriction*)

A former city official or employee cannot represent anyone except himself or herself or immediate family members in any litigation involving the city if the matter relates to duties in which the official or employee substantially and personally participated while serving with the city and the interests of the party are adverse to the city.

4) Prior Participation in the Negotiation, Award or Administration of Discretionary City Contracts (*Two-Year Restriction*)

A former city official or employee cannot work for compensation on a discretionary city contract for two years after leaving city service if he or she personally and substantially participated in the award, negotiation or administration of the contract.

City Contracts in which the Former Official or Employee did not Participate:

If a former official or employee would like to accept employment for compensation regarding a discretionary contract with the city, where he or she did not participate in the negotiation, award or administration of the contract, the former official or employee may accept that employment but must notify the Office of the City Clerk in writing. This requirement is imposed for two years after the official or employee leaves city service.



REPORTING REQUIREMENTS

Forms for Travel and Gift Disclosure reports are available on the city's Ethics webpage at www.sanantonio.gov/ecfl, the Office of the City Clerk or the Office of the City Attorney

1) Travel Reports

With approval of the board or commission, board and commission members may accept payment of or reimbursement for reasonable expenses for travel related to city business. However, if these expenses are paid by a non-governmental source, the member must submit a Travel Form before leaving on the trip.

The travel form lists:

- 1) the name of the person or entity paying the expenses;
- 2) the place the employee will visit;
- 3) the purpose and dates of the travel;
- 4) the estimated amount of the expenses paid.

2) Conflicts of Interest and Recusal Form

If an official discovers that he or she has a conflict of interest in a matter pending before his or her board, the official must:

- Promptly disclose the conflict to the other members of the board or commission;
- File a recusal form at the Office of the City Clerk to disclose the conflict and to describe the matter from which you are removing yourself. Forms are located on the Ethics Website or at the Office of the City Clerk. The board or commission liaison can also assist.
- Refrain from any participation in the matter in which there is a conflict. Recusal requires that the official not be present during the board's discussion or voting on the matter.



3) Disclosure of Business Relationships and Gifts with Contractors and Vendors (the “CIS” form)

Chapter 176 of the Texas Local Government Code requires city officials, including boards and commissions members, to submit Form CIS (Conflicts Disclosure Statement) with the Office of the City Clerk within seven days of becoming aware of either of the following situations:

A city officer or the officer’s family member has an employment or business relationship that results in taxable income with a person who has contracted with the city or with whom the city is considering doing business; or

A city officer or the officer’s family member receives and accepts one or more gifts with an aggregate value of \$250 in the preceding 12 months from a person who conducts business or is being considered for business with the officer’s city. Gifts of food, transportation, lodging and entertainment do not need to be reported in this form.

4) Annual Financial Disclosure Statements

The Ethics Code requires city boards and commissions members to submit annual financial disclosure reports due on the 1st day of March. If March 1 falls on a weekend or city holiday, the deadline is extended to the next business day. The annual financial disclosure report requires information regarding:

- Members of immediate family or household;
- Business interests of official and close family members, including any businesses in which the official or family members own 10% or more which has an interest in a city contract or subcontract;
- Other sources of income;
- Name of non-profits on which the official serves in decision-making role;
- Receipt of gifts.

Personal Financial Statements. Elected officials, the City Manager and the City Attorney are required to submit a Personal Financial Statement required by Chapter 159 of the Local Government Code. The statement is due on April 30. These city officials also file a Financial Disclosure Addendum as required by the city’s Ethics Code. The addendum is also due April 30.



ADVISORY OPINIONS AND ETHICS COMPLAINTS

Advisory Ethics Opinions

Any city official or employee may request an advisory ethics opinion from the Office of the City Attorney regarding that person's own actions. A person who reasonably and in good faith acts in accordance with an opinion issued by the Ethics Compliance Officer may not be found to have violated the ethics laws by engaging in conduct approved in the advisory opinion, provided that: the request fairly and accurately discloses all relevant facts.

Some advisory opinions are posted on the city's ethics webpage in a manner that does not reveal the identity of the person making the inquiry. Please contact the Office of the City Attorney for more information. See Contacts and Resource Information on page 21.

Ethics Complaints

The Ethics Review Board has the jurisdiction to review allegations of violations of the City's Ethics Code, www.sanantonio.gov/atty/reference/charter.htm Section 141 of the City Charter and www.capitol.state.tx.us/statutes/lg.toc.htm Section 171 of the Texas Local Government Code. The Ethics Review Board does not have the jurisdiction or the authority to review allegations of violations of other bodies of law, nor is it charged with resolving disputes with the city that do not pertain to the Ethics Code. The Board cannot consider any alleged violation that occurred more than two years prior to the date of the filing of a complaint

Procedure to File an Ethics Complaint.

Any person who believes there has been a violation of the ethics laws may file a sworn complaint. The sworn ethics complaint must be filed in the Office of the City Clerk and addressed to the Ethics Review Board.

The complaint must include:

- 1) the name of the complainant;
- 2) the mailing address and contact telephone number of the complainant;
- 3) the name of each person complained about;
- 4) the position or title of each person complained about;
- 5) the nature of the alleged violation. If possible, **state the specific rule or provision of law alleged to have been violated;**



- 6) a statement of facts describing the alleged violation and the dates on which or period of time during which the alleged violation(s) occurred;
- 7) include any documents or other material available to the complainant that are relevant to the allegation.

Response to a Complaint

Any person against whom a complaint has been filed will be notified by the Office of the City Clerk and will be provided an opportunity to respond. Ethics Review Board complaint procedures are found in Division 8 of the Ethics Code.

Sanctions

Possible sanctions that may be imposed in the event the Ethics Review Board determines that an individual has committed a violation of the Ethics Code:

- Civil fine of up to \$500;
- Referral to Ethics training;
- Letter of Notification;
- Letter of Admonition;
- Letter of Reprimand;
- Referral for Disciplinary Action under Personnel Rules;
- Debarment from Lobbying or Contracting;
- Voiding or Modification of Contracts;
- Suit for Damages or Injunctive Relief.

Information

You are welcome to contact the ethics attorneys at the Office of the City Attorney at (210) 207-8940 or the Office of the City Clerk at (210) 207-7253 concerning any questions you may have regarding the city's Ethics Code.

A family relationship chart explaining the degrees of relatives is included on page 20, and a list of contacts and resources information is included on page 21.



DEGREES OF FAMILY RELATIONSHIPS

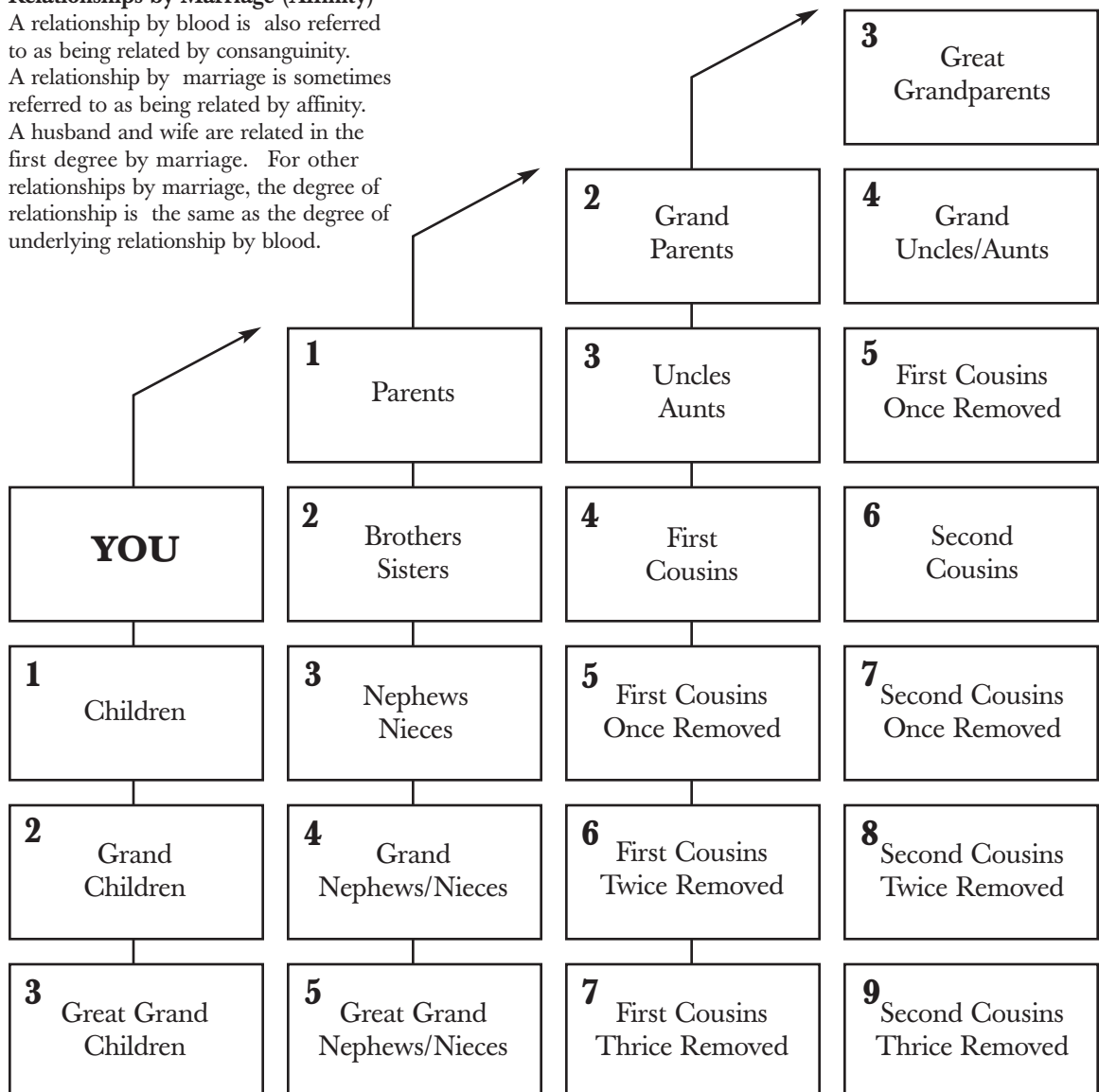
Relationships by Blood (Consanguinity)

Relationships by Marriage (Affinity)

A relationship by blood is also referred to as being related by consanguinity.

A relationship by marriage is sometimes referred to as being related by affinity.

A husband and wife are related in the first degree by marriage. For other relationships by marriage, the degree of relationship is the same as the degree of underlying relationship by blood.





CONTACTS AND RESOURCES INFORMATION

OFFICE OF THE CITY ATTORNEY ETHICS COMPLIANCE OFFICER

Physical Address

Office of the City Attorney
City Hall, Third Floor
100 South Flores
San Antonio, TX 78205

Mailing Address

Office of the City Attorney
City Hall
P.O. Box 839966
San Antonio, TX 78283
(210) 207-8940
Email: ethics@sanantonio.gov

OFFICE OF THE CITY CLERK ETHICS SUPERVISOR

Physical Address

Office of the City Clerk
City Hall, Second Floor
100 South Flores
San Antonio, TX 78205

Mailing Address

Office of the City Clerk
City Hall
P.O. Box 839966
San Antonio, TX 78283
(210) 207-7253
Email: ethics@sanantonio.gov

Ethics Review Board

The Ethics Review Board may be contacted through the Office of the City Clerk.

City Ethics WebPage: www.sanantonio.gov/ecfl
(includes complete Ethics Code and all ethics forms).



Office of the City Attorney
City Hall
P.O. Box 839966
San Antonio, TX 78283
(210) 207-8940